

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Actava TV, Inc., Master Call Communications, Inc.,
Master Call Corporation, and Rouslan Tsoutiev,

18-CV-06626 (ALC)(KNF)

Plaintiffs,

-against-

Joint Stock Company “Channel One Russia Worldwide,”
Closed Joint Stock Company “CTC Network,” Closed
Joint Stock Company “New Channel”, Limited Liability
Company “Rain TV-Channel,” Closed Joint Stock
Company “TV DARIAL,” Limited Liability
Company “Comedy TV,” and Kartina Digital GmbH

**DECLARATION OF
RAYMOND J. DOWD**

Defendants.

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RAYMOND J. DOWD, ESQ., an attorney admitted to practice in the Southern District of New York declares subject to penalties of perjury under the laws of the United States of America as follows:

1. I am a member of Dunnington Bartholow & Miller LLP (“Dunnington”),
attorneys for Defendant Broadcaster Joint Stock Company “Channel One Russia Worldwide,”
2. I submit this declaration in support of Defendants’ motion to compel
Plaintiffs/Counterclaim Defendants Actava TV, Inc., Master Call Communications, Inc., Master
Call Corporation, and Rouslan Tsoutiev (collectively “Actava”) to produce documents.
3. I have actual knowledge of the facts set forth herein unless otherwise stated.
4. Attached hereto as **Exhibit 1** are Defendant Broadcasters’ First and Second Set of
Requests for the Production of Documents from Actava.
5. Attached hereto as **Exhibit 2** is the Settlement Agreement entered into between
Defendants and Actava dated April 26, 2016.

6. Attached hereto as **Exhibit 3** are excerpts from the Deposition of Rouslan Tsoutiev held on December 18, 2020.

7. Attached hereto as **Exhibit 4** are excerpts from the Deposition of Irina Pliss held on January 19, 2021.

8. Attached hereto as **Exhibit 5** are excerpts from the Deposition of Andrew Makhotin held on December 19, 2020.

9. Attached hereto as **Exhibit 6** are Plaintiffs' February 22, 2019 Rule 26 Initial Disclosures.

Dated: New York, New York
February 5, 2021

/s/ Raymond J. Dowd
Raymond J. Dowd